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14 of all others similarly situated

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

17 AISHA BOWEN, an individual, on
18 behalf of herself and all others similarly
19 situated

20 Plaintiff,

21 vs.

22 TARGET CORPORATION, a
23 Minnesota corporation; and DOES 1
24 through 50, inclusive,

25 Defendants.

Case No.: 2:16-cv-02587-JGB-MRW

[Assigned to the Honorable
Jesus G. Bernal, Courtroom 1]

**PLAINTIFF'S REQUEST FOR
JUDICIAL NOTICE RE: REPLY
IN SUPPORT OF MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

Date: November 18, 2019
Time: 9:00 a.m.
Courtroom: 1

Complaint Filed: December 7, 2015
Trial Date: None Set

Pursuant to Federal Rule of Evidence 201, Plaintiff Aisha Bowen (“Plaintiff”) respectfully requests that the Court take judicial notice of two trial court briefs filed in this Court. Judicial notice of the Court’s own records in other litigation related to this case is particularly appropriate under Federal Rule of Evidence 201(b)(2). *United States v. Wilson*, 631 F.2d 118, 119 (9th Cir. 1980); *No Cost Conference, Inc. v. Windstream Comm’ns, Inc.*, 940 F.Supp.2d 1285, 1295 (S.D. Cal. 2013).

Plaintiff requests that the Court take judicial notice of the following trial court filings:

1. From the lawsuit *Halley v. Target Corporation*, Case No. 8:17-cv-00692-JGB-MRW (C.D. Cal.), the Memorandum In Support of Defendant Target Corporation’s Motion to Dismiss, or, In the Alternative, To Stay Because of Earlier Filed Litigation [ECF No. 14-1]. Defendant filed this brief in the *Halley* matter on May 5, 2017. A true and correct copy of this brief is attached as **Exhibit A**.

2. From the lawsuit *Montgomery et al. v. Target Corporation*, Case No. 2:19-cv-04924-JGB-MRW, the Amended Memorandum In Support of Defendant Target Corporation’s Motion to Stay This Action In Its Entirety Or, In the Alternative, to Stay Plaintiffs’ Second Through Eighth Claims for Relief [ECF No. 36-1]. Defendant filed this brief in the *Montgomery* matter on August 28, 2019. A true and correct copy of this brief is attached as **Exhibit B**.

DATED: October 11, 2019

MATERN LAW GROUP, PC

By:

/s/ Andrew J. Sokolowski

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similarly situated